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**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF WYOMING**

UNITED STATES OF AMERICA,

Plaintiff,

v.

CHRISTOPHER CHARLES BAKER,

Defendant.

Criminal No. 22-mj-56-ABJ

SECOND UNOPPOSED MOTION TO TOLL SPEEDY TRIAL CALCULATION

The Defendant, Christopher Charles Baker, by and through his attorney, David Weiss, Assistant Federal Public Defender, hereby requests a second period of tolling the grand jury presentment pursuant to 18 U.S.C. § 3161(h)(7)(A). The United States, represented by its attorney, Kerry J. Jacobson, Assistant United States Attorney, consents to this Motion and accompanying Proposed Order.

As represented by the Defendant's signature below, the Defendant, Christopher Charles Baker, states as follows:

1. I am the Defendant in this proceeding, and am represented by David Weiss.
2. I understand that pursuant to 18 U.S.C. § 3161(b), I have the right to have my case presented to a grand jury within thirty (30) days of my arrest, or, if no grand jury has been in

session during such thirty-day period, the period of time for filing of the indictment shall be extended an additional thirty days.

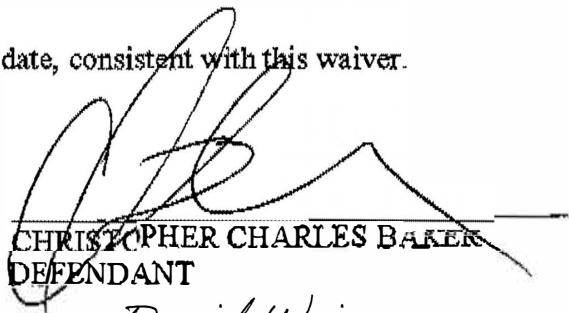
3. I submitted my first request to toll grand jury presentment pursuant to 18 U.S.C. § 3161(h) (7)(A) for a period not to exceed 75 days on November 15, 2022 (ECF Doc.17) and the court granted my request on November 15, 2022 (ECF Doc.18).

4. I am making this second request because I am continuing to negotiate with the United States to resolve this case and believe it is in my best interest to do so prior to presentment if possible. The parties are negotiating possible strategies for resolution of this case that will require additional time. Additionally, this is an ongoing investigation, and the United States anticipates having additional discovery to send out in the near future. I need additional time to review any new discovery, and consider whether it may be possible to strategize an agreement in my case prior to presentment to a grand jury. I further request that an Order be entered providing that this time period shall be tolled and excluded from the speedy indictment time computation pursuant to 18 U.S.C. § 3161(h)(7)(A).

5. I make this request knowingly and voluntarily and after consultation with counsel. If I cannot reach an agreement with the United States Attorney's Office, I understand that my case will be presented to the grand jury at a later date, consistent with this waiver.

DATE:

1/5/23


CHRISTOPHER CHARLES BAKER
DEFENDANT

David Weiss

DAVID WEISS
ASSISTANT FEDERAL PUBLIC DEFENDER
ATTORNEY FOR DEFENDANT